

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MATTHEW STEIN and JEROME LHOTE,

Plaintiffs/Counterclaim-Defendants,

v.

LUKE MCGEE,

Nominal Defendant,

SKATTEFORVALTNINGEN,

Defendant/Counterclaim-Plaintiff,

v.

LUKE MCGEE,

Counterclaim-Defendant.

23 Civ. 2508 (NRB)

**TRIAL EVIDENCE**

**I. PLAINTIFFS' AND NOMINAL DEFENDANT'S EXHIBITS\***

<b>Plaintiffs' Exhibits</b>	<b>Nature of Exhibit<sup>†</sup></b>	<b>SKAT's Pending Objection(s) Set Out in ECF 177-1 and/or Notes</b>
PX-1	E-mail from SØIK to M. Stein's U.S. counsel regarding charging decision	

\* The parties met and conferred in advance of trial, updated or replaced several exhibits, including with certified translations, and resolved certain objections. Accordingly, the parties list in this submission only the unresolved, live disputes.

<sup>†</sup> SKAT notes that certain of Plaintiffs' and Nominal Defendant's descriptions of their exhibits attempt to summarize their content and hint at their supposed relevance, rather than identify them by author, title or in case of emails, subject, and date, as SKAT did in describing its exhibits. For instance, PX-5 is described as "Danish news article identifying M. Stein and J. Lhote (translation)," rather than its title, "Here is the backers' deduction – one item is gigantic." And PX-15-R is described as "E-mail from SØIK to SKAT discussing 2-26-21 questions [Certified Translation], 2-2021 through 2-2022," rather than as an email chain between SKAT and SØIK from February 2021 to February 2022, regarding "Request for additional information regarding the Danish Tax Agency settlement agreement." For the avoidance of doubt, SKAT does not adopt Plaintiffs' and Nominal Defendant's characterization of their exhibits.

Stein, Lhote, and McGee submit that their descriptions of their exhibits are accurate and appropriate. For example, PX-5 plainly identifies Stein and Lhote, including containing a photograph of Stein, and, as such, can

<b>Plaintiffs' Exhibits</b>	<b>Nature of Exhibit<sup>†</sup></b>	<b>SKAT's Pending Objection(s) Set Out in ECF 177-1 and/or Notes</b>
PX-2	2017 Draft Settlement Agreement	Relevance
PX-3	Records of payments of Initial Cash Payment	
PX-4	SKAT complaint against A. LaRosa, <i>et al.</i>	
PX-5	Danish news article identifying M. Stein and J. Lhote (translation)	
PX-6	Records of payments of Subsequent Cash Payment	
PX-7	E-mail chain between M. Miller and SKAT's U.S. counsel regarding SKAT's provision of information to SØIK, 12-2020 through 2-2021	Relevance Hearsay
PX-8	E-mail from M. Miller to SKAT's U.S. counsel regarding cooperation, 3-4-2021	Relevance
PX-9	Letter from SKAT's U.S. counsel regarding SKAT's correspondence with SØIK pursuant to Section 8(f), 4-21-2023	
PX-10A	Executed 2019 Affidavit of Confession of Judgment	
PX-11	E-mail chain and attachment from SKAT's U.S. counsel regarding SKAT's correspondence with SØIK pursuant to Section 8(f), 4-2023	
PX-12	E-mails between SØIK and U.S. Dept. of Justice, 5-2020 through 1-2021	Relevance Hearsay Foundation
PX-13	Letter from M. Miller to SØIK providing Settlement Agreement + Attachment, 4-21-2021	
PX-14-R	Documents regarding seizure of M. Stein, J. Lhote, and L. McGee assets [Certified Translation]	Hearsay

safely described as such. The same is true for PX-15-R, which is an e-mail, dated February 3, 2022, in which SKAT explicitly refers to SØIK's inquiries from February 26, 2021.

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PX-15-R	E-mail from SØIK to SKAT discussing 2-26-21 questions [Certified Translation], 2-2021 through 2-2022	Relevance
PX-16-R	SØIK e-mail relating to Danish criminal case schedule [Certified Translation], 4-8-2022	Relevance Hearsay Foundation
PX-17	E-mail from SØIK to J. Lhote's U.S. counsel regarding charging decision, 9-2020	
PX-27	Letter from J. Benjamin to J. Schneider regarding L. McGee's payments under Settlement Agreement, 4-8-2021	Hearsay
PX-101	E-mail chain between SKAT and SØIK regarding settlement negotiations, 4-2019	Uncertified translation  SKAT has provided a certified translation as DX-530
PX-103	E-mail chain regarding SKAT providing draft Section 8(f) to SØIK, 5-2019	Uncertified translation  SKAT has provided a certified translation as DX-555
PX-104	Executed Settlement Agreement, 5-2019	
PX-105	E-mail from SKAT to SØIK providing draft Section 8(f), 5-15-2019	Uncertified translation  SKAT has provided a certified translation as DX-532
PX-106	SKAT's press release announcing the Settlement Agreement, 5-28-2019	Uncertified translation  SKAT has provided a certified translation as DX-540
PX-107	E-mail chain between SKAT and SØIK regarding draft press release, 5-20-2019	Uncertified translation  SKAT has provided a certified translation as DX-538

<b>Plaintiffs' Exhibits</b>	<b>Nature of Exhibit<sup>†</sup></b>	<b>SKAT's Pending Objection(s) Set Out in ECF 177-1 and/or Notes</b>
PX-108	E-mail from SKAT to SØIK providing Settlement Agreement exhibits, 5-21-2019	Uncertified translation  SKAT has provided a certified translation as DX-533
PX-109	Executed Letter Agreement, 5-2019	
PX-110	E-mail chain regarding SKAT providing principles for communications to SØIK, 5-2019	Uncertified translation  SKAT has provided a certified translation as DX-535
PX-113	E-mail from SKAT to SØIK regarding 6-27-19 meeting to discuss Settlement Agreement, 6-26-2019	Uncertified translation  SKAT has provided a certified translation as DX-541
PX-114	Agenda for 7-3-2020 meeting	Uncertified translation  SKAT has provided a certified translation as DX-546
PX-115	SKAT e-mail chain regarding draft September 2019 press release, 9-25-2019	Uncertified translation  SKAT has provided a certified translation as DX-544
PX-118	SØIK's 1-6-21 inquiry to SKAT and e-mail chain	Uncertified translation  SKAT has provided a certified translation of a portion of PX-118 as DX-569
PX-120	SKAT e-mail chain regarding draft response to SØIK's 1-6-21 inquiry, 1-2021	Uncertified translation  SKAT has provided a certified translation as DX-552
PX-121	SKAT e-mail chain providing response to SØIK's 1-6-2021 inquiry, 1-2021	Uncertified translation  SKAT has provided a certified translation (with different bates numbering) as DX-548

<b>Plaintiffs' Exhibits</b>	<b>Nature of Exhibit<sup>†</sup></b>	<b>SKAT's Pending Objection(s) Set Out in ECF 177-1 and/or Notes</b>
PX-122	SKAT e-mail chain regarding SØIK's 1-22-21 inquiry to SKAT for a copy of Settlement Agreement, 1-2021	
PX-123	E-mail chain forwarding SØIK's 1-28-21 inquiry to SKAT, 1-28-2021	
PX-124	SKAT e-mail chain providing response to SØIK's 1-28-2021 inquiry, 1-2021 through 2-2021	Uncertified translation  SKAT has provided a certified translation (with different bates numbering) as DX-550
PX-125	SØIK's 2-26-21 inquiry to SKAT	Uncertified translation  SKAT has provided a certified translation (with different bates numbering) as DX-551
PX-127	Email chain between M. Miller and SKAT's U.S. counsel regarding providing copy of Settlement Agreement to SØIK, 4-2021	
PX-128	Email from SKAT's U.S. counsel regarding information SKAT provided to SØIK pursuant to Section 8(f), 6-18-2021	
PX-129	Executed 2021 Affidavit of Confession of Judgment	
PX-130-R	Danish court opinion regarding Bech Bruun [Certified Translation], 11-20-2023	Relevance Hearsay
PX-131	SKAT e-mail chain regarding SØIK's 1-22-21 inquiry to SKAT for a copy of Settlement Agreement, 1-2021	
PX-137	SKAT's 4-12-23 e-mail to SØIK re Section 8(f)	SKAT has provided a certified translation as DX-554
PX-141	SKAT's email to SØIK regarding confidentiality of Settlement Agreement, 1-2021	

<b>Plaintiffs' Exhibits</b>	<b>Nature of Exhibit<sup>†</sup></b>	<b>SKAT's Pending Objection(s) Set Out in ECF 177-1 and/or Notes</b>
PX-141T	SKAT's email to SØIK regarding confidentiality of Settlement Agreement [Translated], 1-2021	Uncertified translation  SKAT has provided a certified translation (with different bates numbering) as DX-553
PX-164	SKAT e-mail regarding collection of documents exchanged with SØIK, 4-20-2021	Portions of PX-164 admitted as DX-548, DX-550, and DX-553
PX-165	SKAT e-mail regarding status of 2-26-21 inquiry from SØIK, 4-20-2021	
PX-166	SKAT e-mail regarding updated collection of documents exchanged with SØIK, 4-20221	Portions of PX-166 admitted as DX-548, DX-550, DX-551, DX-553, and DX-569
PX-167	SØIK 9-26-19 Press Release [Certified Translation]	
PX-169	SKAT e-mail regarding response to SØIK regarding settlement, 4-20-2021 through 4-21-2021	
PX-200	Final letter to SKAT's U.S. counsel providing MPSKAT documents, 7-18-2021	
PX-201	Final letter to SKAT's U.S. counsel providing True-Up Spreadsheets, 6-30-2021	
PX-202	Letter from North Channel Bank regarding opening of custody account, 10-27-2014	
PX-203	2015 custody account spreadsheet	
PX-204	June 2015 custody account statement	
PX-205	2016 custody account spreadsheet	
PX-206	January 2017 custody account statement	
PX-207	April 2017 custody account statement	
PX-208	Letter from North Channel Bank regarding lack of activity, 4-25-2016	

<b>Plaintiffs' Exhibits</b>	<b>Nature of Exhibit<sup>†</sup></b>	<b>SKAT's Pending Objection(s) Set Out in ECF 177-1 and/or Notes</b>
PX-209	Subsequent letter from North Channel Bank regarding lack of activity, 12-15-2016	
PX-210-R	Danish court ruling regarding seizure of North Channel Bank custody accounts [Certified Translation], 2-16-2017	
PX-211-R	German court ruling regarding seizure of North Channel Bank custody accounts [Certified Translation]	
PX-212	May 2015 custody account statement and November 2013 custody account statement	
PX-213	February 2015 custody account statement	
PX-300	Expert Report prepared by L. Madsen	
PX-301	Rebuttal Expert Report prepared by L. Madsen	
PX-306	Second Amended Attachment C to Expert Report and Rebuttal Expert Report [Certified Translation]	
PX-307	Danish Penal Code Sections 51-55 [Certified Translation]	
PX-400-R	30(b)(6) Deposition Testimony of SKAT [Amended]	
PX-401	SKAT's Responses and Objections to Plaintiffs' Requests for Admission, 7-23-2024	Object to the relevance of RFA 34
PX-402	SKAT's Responses and Objections to McGee's Requests for Admission, 7-23-2024	Object to the relevance of RFA 36
PX-403-R	SKAT's Responses and Objections to Plaintiffs' Second Interrogatories [Amended], 7-15-2024	Object to the relevance of interrogatories 7 and 9

Plaintiffs' Exhibits	Nature of Exhibit <sup>†</sup>	SKAT's Pending Objection(s) Set Out in ECF 177-1 and/or Notes
PX-404-R	SKAT's Responses and Objections to McGee's First Interrogatories [Amended], 7-15-2024	Object to the relevance of interrogatories 3 and 5

## II. SKAT'S EXHIBITS

SKAT's Exhibits	Nature of Exhibit	Plaintiffs' Pending Objection(s) Set Out in ECF 178 and/or Notes
DX-505-R	Per Justesen's Expert Report on Danish Criminal Law, with Appendix List and Appendices 1-17 (September 6, 2024)	
DX-506-R	Per Justesen's Rebuttal Expert Report, with Appendix 1 (October 15, 2024)	
DX-507	Luke McGee Deposition Transcript Excerpts (June 10, 2024)	
DX-508	Jerome Lhote Deposition Transcript Excerpts (May 16, 2024)	
DX-509	Matthew Stein Deposition Transcript Excerpts (May 9, 2024)	
DX-514	Email from A. Møllmann to J. Schneider and K. Erlandsen, re SØK-76141-00005-17, vores nr. 110.448, investigation request and interrogation (September 10, 2020) [ <b>Certified Translation</b> ]	
DX-516	Email from A. Møllmann to J. Schneider and K. Erlandsen, re Interview with Luke McGee (November 23, 2020)	<p>Foundation Hearsay</p> <p>Original document is in Danish; Danish document is missing</p> <p><i>SKAT's response: This document was produced by Plaintiffs, who did not produce a Danish version of this document. SKAT does not have the Danish version.</i></p>



SKAT's Exhibits	Nature of Exhibit	Plaintiffs' Pending Objection(s) Set Out in ECF 178 and/or Notes
DX-520	M. Stein, J. Lhote and L. McGee Indictment (April 13, 2021)	
DX-523	M. Stein's Objections and Responses to SKAT's First Requests for Admission (July 23, 2024)	
DX-524	J. Lhote's Objections and Responses to SKAT's First Requests for Admission (July 23, 2024)	
DX-525	L. McGee's Responses to SKAT's First Requests for Admission (July 23, 2024)	
DX-526	Hearing Transcript of North Channel Bank's Guilty Plea (September 23, 2019)	Hearsay Authenticity Foundation
DX-527	SKAT's Notice of Breach to M. Stein, J. Lhote and L. McGee's counsel (May 29, 2023)	
DX-528	Email from G. Ahlefeld-Engel to S. Nygaard Ekstrøm, re The settlement negotiations and SØIK (June 4, 2019) [ <b>Certified Translation</b> ]	
DX-529	Email from G. Ahlefeld-Engel to P. Fiig, re Settlement (April 25, 2019) [ <b>Certified Translation</b> ]	
DX-530	Email from G. Ahlefeld-Engel to P. Fiig, re Settlement (April 25, 2019) [ <b>Certified Translation</b> ]	Corresponds to PX-101, which includes translation that was provided by SKAT and that was used at deposition (Tr. 432:22-433:1)*

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\* After SKAT produced many Danish language documents during discovery, it also, as a convenience to the parties, produced uncertified/unofficial translations to make the documents more usable for the opposing parties. SKAT never suggested that the production of such translations as a discovery aid relieved any party's obligation to provide certified translations for documents that party intended to use at trial. Plaintiffs' and Nominal Defendant's notations that uncertified translations of certain exhibits were used at depositions are irrelevant. To the extent there is both a certified and uncertified translation of a particular trial exhibit, the Court should rely on the certified version. (Tr. 405:12-13.)

<b>SKAT's Exhibits</b>	<b>Nature of Exhibit</b>	<b>Plaintiffs' Pending Objection(s) Set Out in ECF 178 and/or Notes</b>
DX-531	Email from P. Fiig to G. Ahlefeld-Engel, re Settlement (April 25, 2019) [ <b>Certified Translation</b> ]	
DX-532	Email from G. Ahlefeld-Engel to P. Fiig and S. Bechmann Jacobsen, re Extract of relevant settlement text (May 15, 2019) [ <b>Certified Translation</b> ]	Corresponds to PX-105, which includes translation that was provided by SKAT and that was used at deposition (Tr. 432:22-433:1)
DX-533	Email from G. Ahlefeld-Engel to P. Fiig and S. Bechmann Jacobsen, re The parties to the settlement agreement, attaching "Settlement Agreement Exhibits Draft- 5.14.19" (May 21, 2019) [ <b>Certified Translation</b> ]	Corresponds to PX-108, which includes translation that was provided by SKAT and that was used at deposition (Tr. 432:22-433:1)
DX-534	Email from A. Munksgaard to S. Bechmann Jacobsen, re Draft PR (May 14, 2019) [ <b>Certified Translation</b> ]	Hearsay
DX-535	Email from S. Bechmann Jacobsen to G. Ahlefeld-Engel, re Principles, attaching "Principles for communication - final draft - dated 21 May 2019" (May 23, 2019) [ <b>Certified Translation</b> ]	Hearsay  Corresponds to PX-110, which includes translation that was provided by SKAT and that was used at deposition (Tr. 432:22-433:1)
DX-536	Email from G. Ahlefeld-Engel to S. Bechmann Jacobsen, re Extract from relevant settlement text (May 15, 2019) [ <b>Certified Translation</b> ]	
DX-537	Email from S. Bechmann Jacobsen to M. Jakobsen and G. Ahlefeld-Engel, re Final draft of press release and principles for other communications, attaching "Press release - final draft" and "Principles for communication - final draft" (May 20, 2019) [ <b>Certified Translation</b> ]	

<b>SKAT's Exhibits</b>	<b>Nature of Exhibit</b>	<b>Plaintiffs' Pending Objection(s) Set Out in ECF 178 and/or Notes</b>
DX-538	Email from S. Bechmann Jacobsen to G. Ahlefeld-Engel, re Final draft of press release and principles for other communication, attaching "Press release - final draft" (May 20, 2019) [ <b>Certified Translation</b> ]	Hearsay within hearsay  Corresponds to PX-107, which includes translation that was provided by SKAT and that was used at deposition (Tr. 432:22-433:1)
DX-539	SKAT Press release, "The dividend case: The Danish Tax Agency enters into billion kroner settlement with US pension plans - 61 US pension plans agree to repay approximately DKK 1.6 billion paid out in dividend refunds in the period 2012-2015" (May 22, 2019) [ <b>Certified Translation</b> ]	
DX-540	SKAT Press release, "The dividend case: The Danish Tax Agency enters into billion kroner settlement with US pension plans - 61 US pension plans repay approx. 1.6 billion DKK, which has been paid out in dividend refund in the period 2012-15" (May 28, 2019) [ <b>Certified Translation</b> ]	Corresponds to PX-106, which includes translation that was provided by SKAT and that was used at deposition (Tr. 432:22-433:1)
DX-541	Email from G. Ahlefeld-Engel to M. Jakobsen, et al., re Tentative agenda for coordination meeting on 27/6 (June 26, 2019) [ <b>Certified Translation</b> ]	Corresponds to PX-113, which includes translation that was provided by SKAT and that was used at deposition (Tr. 432:22-433:1)
DX-542	Meeting invite from E. Yilmaz to S. Bechmann Jacobsen, et al., re Status meeting regarding Dividend (June 27, 2019) [ <b>Certified Translation</b> ]	
DX-543	Email from P. Fiig to G. Ahlefeld-Engel, re Extract from relevant settlement text (September 20, 2019) [ <b>Certified Translation</b> ]	

<b>SKAT's Exhibits</b>	<b>Nature of Exhibit</b>	<b>Plaintiffs' Pending Objection(s) Set Out in ECF 178 and/or Notes</b>
DX-544	Email from E. Haugland to C. Holm, et al., re Press Release <sup>3</sup> , attaching "Press Release <sup>3</sup> " (September 25, 2019) [ <b>Certified Translation</b> ]	Corresponds to PX-115, which includes translation that was provided by SKAT and that was used at deposition (Tr. 432:22-433:1)
DX-545	SKAT Press Release, "The Danish Tax Agency and SØIK: Politiken and TV2 mislead about dividend settlement" (November 24, 2019) [ <b>Certified Translation</b> ]	
DX-546	SKAT Memo, re Annotated Agenda for Progress Meeting on the Dividend Case - Friday July 3 2020, 12.30-2.00 PM via Gotomeeting (June 29, 2020) [ <b>Certified Translation</b> ]	Corresponds to PX-114, which includes translation that was provided by SKAT and that was used at deposition (Tr. 432:22-433:1)
DX-547	Meeting invite from E. Yilmaz to G. Ahlefeld-Engel, et al., re Status meeting with SØIK and KA (July 3, 2020) [ <b>Certified Translation</b> ]	
DX-548	Email from B. Spang to G. Ahlefeld-Engel, et al., re Request from SØIK regarding settlement, attaching "Exhibit 1", "Exhibit 2", "Sec. 8 on confidentiality" and "Response to SØIK regarding settlement with 61 pension plans and others (Final)" (January 19, 2021) [ <b>Certified Translation</b> ]	Corresponds to PX-121, which includes translation that was provided by SKAT and that was used at deposition (Tr. 432:22-433:1)
DX-549	SKAT Press release, "The dividend case: The Danish Tax Agency enters into billion kroner settlement with US pension plans - 61 US pension plans agree to repay approximately DKK 1.6 billion paid out in dividend refunds in the period 2012-2015" (May 20, 2019) [ <b>Certified Translation</b> ]	

SKAT's Exhibits	Nature of Exhibit	Plaintiffs' Pending Objection(s) Set Out in ECF 178 and/or Notes
DX-550	Email from B. Spang to S. Winther, et al., re Request for additional information, attaching "Copy of Batch Numbers and amount NCB PP" spreadsheet and "Follow-up response to SØIK re. settlement with 61 pension plans et al (030221) (Final)" (March 2, 2021) [ <b>Certified Translation</b> ]	Hearsay Authenticity Foundation  Corresponds to PX-124, which includes translation that was provided by SKAT and that was used at deposition (Tr. 432:22-433:1)
DX-551	Email from S. Winther to B. Spang, re Request for additional information re the Danish Tax Agency's settlement agreement, attaching "Letter to the Danish Tax Agency requesting additional information - re others" (February 26, 2021) [ <b>Certified Translation</b> ]	Hearsay Authenticity Foundation  Corresponds to PX-125, which includes translation that was provided by SKAT and that was used at deposition (Tr. 432:22-433:1)
DX-552	Email from S. Bechmann Jacobsen to B. Spang, et al., re Request from SØIK regarding settlement (January 14, 2021) [ <b>Certified Translation</b> ]	Corresponds to PX-120, which includes translation that was provided by SKAT and that was used at deposition (Tr. 432:22-433:1)
DX-553	Email from B. Spang to S. Winther and S. Bechmann Jacobsen, re Urgent - request to forward settlement agreement (January 22, 2021) [ <b>Certified Translation</b> ]	Corresponds to PX-141 and 141T, the latter of which is the translation that was provided by SKAT and that was used at deposition (Tr. 432:22-433:1)
DX-554	Email from C. Lindrum Bay to P. Fiig, re Orientation regarding settlement, attaching "letter to NSK 120423" (April 12, 2023) [ <b>Certified Translation</b> ]	Relevance Hearsay Foundation  Corresponds to PX-137, which includes translation that was provided by SKAT and that was used at deposition (Tr. 432:22-433:1)
DX-555	Email from S. Bechmann Jacobsen to G. Ahlefeld- Engel, re Settlement text relevant to SØIK (May 15, 2019) [ <b>Certified Translation</b> ]	Corresponds to PX-103, which includes translation that was provided by SKAT and that was used at deposition (Tr. 432:22-433:1)

SKAT's Exhibits	Nature of Exhibit	Plaintiffs' Pending Objection(s) Set Out in ECF 178 and/or Notes
DX-556	Email from G. Ahlefeld- Engel to S. Nygaard Ekstrøm, re Extract from relevant settlement text (June 4, 2019) [ <b>Certified Translation</b> ]	Hearsay within hearsay
DX-557	Email from A. Larsen to S. Bechmann Jacobsen, re Draft PR (May 14, 2019) [ <b>Certified Translation</b> ]	
DX-558	Email from G. Ahlefeld-Engel to S. Nygaard Ekstrøm, re Confidential - updated draft P R (June 4, 2019) [ <b>Certified Translation</b> ]	
DX-559	Email from S. Bechmann Jacobsen to J. Breck, et al., re Principles [ <i>attachment "Principles for communication - final draft - dated 21 May 2019" omitted</i> ] (May 21, 2019) [ <b>Certified Translation</b> ]	
DX-569	Email from S. Winther to C. Lindrum Bay, re Request for information re the Danish Tax Agency's settlement, attaching "Letter to the Danish Tax Agency" (January 6, 2021) [ <b>Certified Translation</b> ]	Corresponds to PX-118, which includes translation that was provided by SKAT and that was used at deposition (Tr. 432:22-433:1)
DX-578	Reclaim application for 10CC Pension Plan (August 21, 2015)	
DX-579	North Channel Bank Account Statement for 10CC Pension Plan (August 31, 2015)	
DX-580	Email from A. Møllmann to K. Erlandsen, re Discussions about McGee's cooperation in solving the case (December 21, 2020) [ <b>Certified Translation</b> ]	Relevance (Tr. 545:15-546:14)
DX-586	Letter to the Danish Parliament - The Tax Committee, re final answer to question no. 573 of July 17, 2020 (September 11, 2020) [ <b>Certified Translation</b> ]	
DX-601E1	Excerpt of the AJJ Holdings LLC Pension Plan Partnership's True-Up Spreadsheet, produced by Wachtell and the Covered Parties	Fed. R. Evid. 1004 (best evidence), 1006 (improper summary chart)

<b>SKAT's Exhibits</b>	<b>Nature of Exhibit</b>	<b>Plaintiffs' Pending Objection(s) Set Out in ECF 178 and/or Notes</b>
DX-601E2	Excerpt of the AJJ Plan's True-Up Spreadsheet, produced by Wachtell and the Covered Parties	Fed. R. Evid. 1004 (best evidence), 1006 (improper summary chart)
DX-601E3	Excerpt of the AJJ Plan's True-Up Spreadsheet, produced by Wachtell and the Covered Parties, which has been annotated to include highlighting	Fed. R. Evid. 1004 (best evidence), 1006 (improper summary chart)
DX-601E4	Excerpt of the AJJ Plan's True-Up Spreadsheet, produced by Wachtell and the Covered Parties	Fed. R. Evid. 1004 (best evidence), 1006 (improper summary chart)
DX-602E1	Excerpt of the Babine Pension Plan Partnership's True-Up Spreadsheet, produced by Wachtell and the Covered Parties	Fed. R. Evid. 1004 (best evidence), 1006 (improper summary chart)
DX-621E1	Excerpt of the Passive Growth Benefits Pension Plan's True-Up Spreadsheet, produced by Wachtell and the Covered Parties	Fed. R. Evid. 1004 (best evidence), 1006 (improper summary chart)
DX-646E1	Excerpt of the NewCo Software Design Pension Plan Partnership's True-Up Spreadsheet, produced by Wachtell and the Covered Parties	Fed. R. Evid. 1004 (best evidence), 1006 (improper summary chart)
DX-656E1	Excerpt of the 2321 Capital Pension Plan's True-Up Spreadsheet, produced by Wachtell and the Covered Parties	Fed. R. Evid. 1004 (best evidence), 1006 (improper summary chart)
DX-657	Marc Landy's True Up Calculation & comparison with Stein's Approach (May 1, 2025)	
PX-612-C-R	E-mail chain from M. Miller to M. Stein and J. Lhote regarding conversation with SKAT's U.S. counsel about written communication to SØIK, 2-2021	